

Message

From: McNeal, Dave [Mcneal.Dave@epa.gov]
Sent: 8/19/2019 8:49:35 PM
To: Mia, Marcia [Mia.Marcia@epa.gov]
CC: Marsh, Karen [Marsh.Karen@epa.gov]
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves
Attachments: Thomaston Compressor Station Response.pdf

Hi Marcia,

The Kinder Morgan letter was signed today, and I have attached a copy.

Ex. 5 Deliberative Process (DP)

David McNeal
EPA Region 4
404-562-9102

From: Mia, Marcia <Mia.Marcia@epa.gov>
Sent: Wednesday, August 14, 2019 11:59 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Hi David,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) Greg Fried can help here, but let me know if I can be of assistance helping you connect.

Marcia B Mia
Air Branch
Office of Compliance
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

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From: Mia, Marcia
Sent: Tuesday, August 13, 2019 5:28 PM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Hi Dave

Sorry I didn't get to this yesterday and I had to travel unexpectedly and just getting into emails.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thanks.

Marcia B Mia
Air Branch
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From: McNeal, Dave <Mcneal.Dave@epa.gov>
Sent: Friday, August 09, 2019 11:18 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: FW: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA

Hi Marcia,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

David McNeal
EPA Region 4
404-562-9102

From: McNeal, Dave
Sent: Thursday, August 08, 2019 11:41 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Ex. 5 Deliberative Process (DP)

From: Mia, Marcia <Mia.Marcia@epa.gov>
Sent: Thursday, August 08, 2019 11:33 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

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Marcia B Mia
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From: McNeal, Dave <Mcneal.Dave@epa.gov>
Sent: Thursday, August 08, 2019 11:02 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Hi Marcia,

I'll be the only person from Region 4 on the call today.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

David McNeal

EPA Region 4
404-562-9102

From: Mia, Marcia <Mia.Marcia@epa.gov>
Sent: Thursday, August 08, 2019 10:04 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>
Cc: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: FW: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Hi dave,

Here are our comments. **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Are you joining the OC Bi-Weekly today? Anyone else from R4? We go first. Here is the final briefing paper which went up.

Marcia B Mia
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202-564-7042

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From: Marsh, Karen <Marsh.Karen@epa.gov>
Sent: Thursday, August 08, 2019 9:29 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Marcia,

Ex. 5 Deliberative Process (DP)

Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division

ED_004016_00079029-00004

Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Mia, Marcia <Mia.Marcia@epa.gov>
Sent: Thursday, August 01, 2019 5:58 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Ex. 5 Deliberative Process (DP)

Marcia B Mia
Air Branch
Office of Compliance
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

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From: McNeal, Dave <Mcneal.Dave@epa.gov>
Sent: Wednesday, July 31, 2019 4:24 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

I have attached my draft response to Kinder Morgan's applicability determination request. Comments are appreciated,

Ex. 5 Deliberative Process (DP)

David McNeal
EPA Region 4
404-562-9102

From: McNeal, Dave
Sent: Thursday, July 25, 2019 1:07 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Hi Karen,

Thanks for the quick response. I'll draft a response to Kinder Morgan, and send it to you and Marcia by sometime early next week.

David McNeal
EPA Region 4
404-562-9102

From: Marsh, Karen

Sent: Thursday, July 25, 2019 12:45 PM

To: McNeal, Dave <Mcneal.Dave@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Hi again Dave,

Ex. 4 CBI

Happy to review any draft responses. Let me know if there's anything else you'd need from me.

Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: McNeal, Dave

Sent: Thursday, July 25, 2019 9:40 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA

This morning I received a call from Kinder Morgan asking about the status of their applicability determination request. I told them that it is still under review, and I did not give them any indication of which way we are leaning on the request.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 4 CBI

Ex. 4 CBI

David McNeal
EPA Region 4
404-562-9102

From: McNeal, Dave
Sent: Wednesday, July 24, 2019 2:56 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: FW: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA

Karen,

I would like to get the OAQPS perspective on the NSPS Subpart OOOOa applicability question posed by Kinder Morgan (KM) in the attached July 10 letter. The company's question is whether a mainline valve co-located with a compressor station is subject to the leak detection and repair requirements in Subpart OOOOa.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

David McNeal
EPA Region 4
404-562-9102

From: Mia, Marcia
Sent: Thursday, July 18, 2019 11:15 AM
To: McNeal, Dave <Mcneal.Dave@epa.gov>

Cc: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Thanks Dave,

I am cc'ing Karen Marsh – the OAQPS contact for the fugitive portions of NSPS OOOOa.

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Marcia B Mia
Air Branch
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U.S. Environmental Protection Agency
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From: McNeal, Dave
Sent: Thursday, July 18, 2019 10:37 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Marcia,

We have received the attached applicability determination request for a Kinder Morgan (KM) owned compressor station in Thomaston, Georgia. KM is asking for a determination regarding whether a mainline valve (MLV) located within the fence line of the Thomaston Compressor Station (TCS) is subject to the equipment leak detection and repair (LDR) requirements in 40 CFR Part 60 Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015).

The TCS has been in operation since 1963, and it became subject to Subpart OOOOa when a new turbine was added at the site on March 31, 2017. During the initial LDR monitoring conducted at the TCS on August 21, 2017, MLV 29 was determined to be leaking. Attachment 5 to KM's applicability determination request provides details regarding several unsuccessful attempts to repair the valve since the leak was detected in August 2017.

After reviewing Subpart OOOOa, KM believes that MLV 29 is not part of the compressor station affected facility covered by the rule, and the purpose of the company's July 10 letter was to seek a formal determination regarding the applicability of Subpart OOOOa to MLV 29.

MLVs are used to segment a gas pipeline so that it can be blown down as rapidly as possible without creating a hazard, and the distance between valves varies between 2.5 to 10 miles. The minimum distance

between any two valves on a pipeline is mandated by Department of Transportation (DOT) regulations in 49 CFR Part 192. The required distance between valves depends primarily on the population density along the pipeline, and I have attached a Word file with the regulatory text that establishes the minimum distance between MLVs.

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If you know on an OAQPS contact that can help with this question, please let me know and/or forward a copy of my email to them. Bruce Moore was the OAQPS contact for Subpart OOOOs, but he has apparently retired, and I don't know if OAQPS currently has a contact for NSPS Subpart OOOOa questions.

David McNeal
EPA Region 4
404-562-9102